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Attorneys for the Estate of Alexander Avlon

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:	:	Case No. 09-40244-MS
	:	
LIFT-TECH ELEVATOR SERVICE, LLC,	:	Chapter 11
	:	
Debtor.	:	
	:	

NOTICE OF MOTION TO DISMISS CHAPTER XI CASE

PLEASE TAKE NOTICE that on January 11, 2010 at 10:00 a.m. or as soon thereafter as counsel may be heard, before the Honorable Morris Stern, United States Bankruptcy Judgment for the United States Bankruptcy Court of the District of New Jersey, Martin Luther King, Jr., Federal Building, 50 Walnut Street, Newark, New Jersey, the Estate of Alexander Avlon ("Avlon Estate"), through its undersigned counsel, shall move before the Court pursuant to Federal Rule of bankruptcy 1112(b) for the entry of an Order dismissing this case with prejudice, and granting any other relief the Court deems just and appropriate.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned will rely upon the accompanying Brief and Certification of Helen Avlon, which set forth the relevant factual and legal basis upon which the relief requested should be granted. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought by the Motion must be in writing and must be filed with the Clerk of the United States Bankruptcy Court at the above address and served upon Winne Banta Hetherington Basralian & Kahn, P.C., Court Plaza South – East Wing, 21 Main Street, Hackensack, New Jersey 07601, Attn: Gary S. Redish, Esq., so as to be received by January 4, 2010 (the “Objection Deadline”)

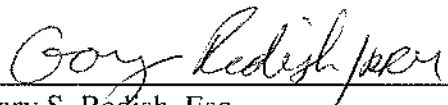
PLEASE TAKE FURTHER NOTICE that unless objections to the Motion are timely filed and served, the Motion shall be deemed uncontested and the Court may enter the proposed Order without a hearing.

PLEASE TAKE FURTHER NOTICE that the Avlon Estate requests oral argument on the return date of this Motion if an objection is filed.

Dated: December 21, 2009

Respectfully submitted,

WINNE, BANTA, HETHERINGTON,
BASRALIAN & KAHN, P.C.

By: 
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